

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DZHOKHAR TSARNAEV

No. 13-CR-10200-GAO

**ASSENTED-TO MOTION FOR LEAVE TO FILE UNREDACTED MOTION TO
COMPEL DISCOVERY AND TWO EXHIBITS THERETO UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file the unredacted version of his Motion to Compel Discovery and two of the exhibits thereto under seal.

The motion to compel and two of the exhibits contain references to statements by identified witnesses. Some of these statements may have been made in grand jury appearances. The government and defense counsel agree that public disclosure of witness identities and the contents of their statements at this time could interfere with both ongoing government and defense investigations and therefore is not in the public interest at this time.

Undersigned counsel will file a redacted version of the Motion to Compel on the public record.

Assistant U.S. Attorney William Weinreb has told defense counsel that the government assents to this motion.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

/s/ William Fick

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 7, 2013.

/s/ William Fick